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*through California Highway Patrol, Blackwood,*  
*Kee, and Rubalcava*  
9

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
12 RIVERSIDE DIVISION  
13

14 **L.C., et al.,**

15 Plaintiffs,

16 v.

17 **STATE OF CALIFORNIA, et al.,**

18 Defendants.  
19  
20  
21  
22

No. 5:22-cv-00949 KK-SHKx

**STATE DEFENDANTS' NOTICE  
OF JOINDER AND JOINDER IN  
COUNTY DEFENDANTS'  
OPPOSITIONS TO PLAINTIFFS'  
MOTIONS IN LIMINE NOS. 1 to 3  
AND 5**

Date: May 15, 2025  
Time: 9:30 a.m.  
Courtroom: 3 (3rd Floor)  
Judge: Hon. Kenly Kiya Kato  
Trial Date: June 2, 2025  
Action Filed: June 7, 2022

23 TO THE COURT AND ALL PARTIES AND COUNSEL OF RECORD:

24 PLEASE TAKE NOTICE that Defendants State of California, by and through  
25 California Highway Patrol, Michael Blackwood, Isaiah Kee, and Bernardo  
26 Rubalcava (State Defendants) join in Defendants County of San Bernardino, Jake  
27 Adams, and Robert Vaccari's (County Defendants) oppositions to Plaintiffs'  
28 motions in limine Nos. 1 to 3 and 5, filed on April 24, 2025, and set for hearing on

1 May 15, 2025, at 9:30 a.m., in Courtroom 3, before the Honorable Kenly Kiya  
2 Kato. (ECF Nos. 147, 148, 160, 161.)

3 This joinder is based on this notice of joinder, the County Defendants'  
4 oppositions to Plaintiffs' motions in limine Nos. 1 to 3 and 5, with all supporting  
5 documents and memorandum, the Court's file in this matter, matters of which the  
6 Court may take judicial notice, and any other matter that may properly come before  
7 the Court. Based on this joinder, the State Defendants respectfully request this  
8 Court issue orders denying Plaintiffs' motions in limine Nos. 1 to 3 and granting  
9 No. 5 only if Plaintiffs agree to preclude their expert, Roger Clark, from offering  
10 any opinion that Defendants' conduct breached or violated police policies and  
11 practices. If Plaintiffs refuse to limit the testimony of Mr. Clark, the Court should  
12 deny their motion in limine No. 5.

13 This Joinder is made following a conference of counsel, concerning all the  
14 motions in limine the parties filed, pursuant to the Court's Standing Order in Civil  
15 Actions and Local Rule 7-16, which took place on April 7 and 11, 2025.

16 Dated: April 24, 2025

Respectfully submitted,

17 ROB BONTA  
18 Attorney General of California  
19 NORMAN D. MORRISON  
Supervising Deputy Attorney General

20 */s/ Diana Esquivel*

21 DIANA ESQUIVEL  
22 Deputy Attorney General  
23 *Attorneys for Defendants State,*  
24 *Blackwood, Kee, and Rubalcava*

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